

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

KT IMAGING USA, LLC,

Plaintiff,

v.

HANGZHOU HIKVISION DIGITAL  
TECHNOLOGY CO., LTD. and HIKVISION  
INTERNATIONAL CO., LIMITED,

Defendants.

Civil Action No.: 6:22-cv-01026

**JURY TRIAL DEMANDED**

**STATEMENT OF RELATEDNESS**

This action is related to other actions considered by the District Court for the Western District of Texas, Waco Division. Specifically, KT Imaging asserted each of the four patents, U.S. Patent No. 8,0004,602 (“the ’602 Patent”), U.S. Patent No. 8,314,481 (“the ’481 Patent”), U.S. Patent No. 6,876,544 (“the ’544 Patent”) and U.S. Patent No. 7,196,322 (“the ’322 Patent”) (“Patents-in-Suit”) in other actions that it had previously filed in in the Waco Division, and the Waco Division Court had construed claims of these Patents-in-Suit. The Waco Division Court had also considered numerous motions, including a motion relating to an expert report, and resolved disputes between parties relating to the technology at issue in these patents. The following is a list of KT Imaging actions involving the Patents-in-Suit considered by the Waco Division Court:

- *KT Imaging USA, LLC v. AsusTek Computer Inc.* (6:20-cv-0300) (Claim Construction Order, Dkt. 40, Albright, J.); and
- *KT Imaging USA, LLC v. Microsoft Corp.* (6:21-cv-1000)

The following is a list of KT Imaging actions involving various combinations of the Patents-in-Suit:

- *KT Imaging USA, LLC v. Acer Amer. Corp. et al.* (6:20-cv-299) (Claim Construction Order, Dkt. 43, Albright, J.) (involving the '602 Patent and '481 Patent);
- *KT Imaging USA, LLC v. Apple Inc.* (6:21-cv-01002) (involving the '602 Patent, '322 Patent and '481 Patent);
- *KT Imaging USA, LLC v. Dell Technologies Inc. and Dell Inc.* (6:21-cv-01004) (involving the '544 Patent, '322 Patent and '602 Patent); and
- *KT Imaging USA, LLC v. Google LLC* (6:21-cv-01003) (involving the '544 Patent, '322 Patent and '481 Patent).

The following is a list of KT Imaging actions involving various combinations of the Patents-in-Suit which are currently pending in the Federal District Court of the Western District of Texas:

- *KT Imaging USA, LLC v. Hanwha Techwin Co., Ltd.* (6:22-cv-00874) (involving the '602 Patent and '481 Patent);
- *KT Imaging USA, LLC v. Prinics Co., Ltd.* (6:22-cv-00875) (involving the '544 Patent and '322 Patent);
- *KT Imaging USA, LLC v. Reolink Digital Technology Co., Ltd.* (6:22-cv-00876) (involving the '602 Patent and '481 Patent); and
- *KT Imaging USA, LLC v. Shenzhen Wansview Technology Co, Ltd.* (6:22-cv-00877) (involving the '602 Patent and '481 Patent).

Dated: October 3, 2022

/s/ Raymond W. Mort, III

Dmitry Kheyfits  
dkheyfits@kblit.com  
Brandon G. Moore  
bmoore@kblit.com  
KHEYFITS BELENKY LLP  
12600 Hill Country Blvd., Suite R-275  
Austin, TX 78738

Tel: 737-228-1838  
Fax: 737-228-1843

Andrey Belenky  
abelenky@kblit.com  
Hanna G. Cohen  
hgcohen@kblit.com  
**KHEYFITS BELENKY LLP**  
80 Broad Street, 5th Floor  
New York, NY 10004  
Tel: 212-203-5399  
Fax: 212-203-6445

Raymond W. Mort, III  
Texas State Bar No. 00791308  
raymort@austinlaw.com  
**THE MORT LAW FIRM, PLLC**  
501 Congress Ave., Suite 150  
Austin, Texas 78701  
Tel/Fax: (512) 865-7950

*Attorneys for Plaintiff*  
*KT Imaging USA, LLC*